

I am in total opposition to the NOI (03-104) and the proposal to allow Power Line Computing (PLC), also known as BPL.

Amateur Radio continues to play a vital role in emergency communications. Amateur Radio is part of every state, county, and municipal plan to deal with every sort of emergency situations. With our country still involved in a war on terrorism, the potential of Amateur Radio operators to provide trained, skilled communications in the event of a disaster caused by a terrorist attack is a vital part of Homeland Security.

The tests of Power Line Computing (PLC) in Japan and throughout Europe have produced a very high level of interference on HF communications, including Amateur Radio. Many, if not most emergency communications via Amateur Radio is done on a portable basis at relatively low power levels. Interference from PLC has the potential to render these communications impossible, as every operator needs to be able to hear the other station over atmospheric noises, and overcoming the noise that PLC produces in the HF spectrum will either severely reduce or effectively end the ability of Amateur Radio operators to provide emergency communications in the event of a natural or man made disaster.

Amateur Radio has proven its ability time and again to be an invaluable asset to the U.S. government, at local, state, and national levels. Just a few more recent and notable examples of this would be during Hurricanes, such as Hurricane Hugo and Hurricane Andrew and many others. During other natural disasters such as the floods in the mid-90s in the Midwest, again Amateur Radio played a vital role. The same can be said of the tornadoes that devastated our nation's heartland, and continue to do so. Amateur Radio and its operators also provided valuable communications assistance during the massive wildfires in the southwest in 2002. The Terrorist attacks such as the Oklahoma City bombing, the terrorist attacks on 9/11 are yet another example where Amateur Radio operators have stepped up, at no cost to anyone, to serve their country with their skills and their own equipment. And as it stands now, Amateur Radio operators throughout the United States stand ready to provide assistance with communications when the conventional means become unavailable, unusable, or congested. They (we) are able to do this by utilizing the HF spectrum, which PLC would severely interfere with.

Another devastating effect of PLC interference would be to the many government agencies that utilize the HF spectrum that would receive interference. They too need to be taken into consideration, as the NTIA has cautioned... Also, short-wave listening, which provides entertainment and news information from all over the world to both young and old alike would be adversely effected. These people have the right to be able to listen in to other countries broadcasts in the HF spectrum without interference blocking their reception abilities.

Yet another and perhaps unforeseen and damaging side effect of PLC interference will be to this nation's economy – if Amateur Radio operators can no longer communicate and short-wave listeners can no longer hear other stations in the HF spectrum they will no longer buy the equipment to do so. This equipment is well into the thousands of dollars in many cases, and the manufacturers of this equipment will eventually have to close their doors and their employees will then be out of a job.

One of the other financial consequences of PLC or BPL interference is the question of who will provide the emergency communications that Amateur Radio operators have and do on a regular basis. The U.S. government would have to pay for training for thousands of radio operators and purchase equipment to use, which for long distance use would normally be in the HF spectrum but would have to be relocated to the microwave bands using satellite relay systems, which would have to be purchased and then launched, all at an unimaginable cost to taxpayers.

In closing, please consider all of the known effects of PLC and its potential for interference to Amateur Radio and the invaluable emergency communications that Amateur Radio provides, on a daily basis. Please consider the potentially devastating effects to the U.S. economy due to the unforeseen or overlooked consequences of implementing such a system, locally or nationwide. Then see about a way of providing the services that PLC would provide in another system, such as fiber optics or some other non-radiating means. The cost of this is small in comparison to the cost of destroying the HF spectrum permanently and subsequently the ability for Amateur Radio operators to provide essential emergency communications during disasters.

PLC would devastate Amateur Radio and its ability to provide the essential and life-saving emergency communications. This simply cannot be allowed to happen; the cost in lives would be far too great. The effects of PLC or BPL would be more devastating than the terrorist attacks on 9/11 were, as it would destroy the ability of Amateur Radio operators to provide emergency communications on a permanent basis.